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February 20, 2018

The Honorable Jesse M. Furman
United States District Judge
Southern District of New York
40 Centre Street, Room 2202
New York, NY 10007

Re: *United States v. Zhengquan Zhang*, Case No. 17-cr-560 (JMF)
Request for Extension of Time to Reply to Opposition to Motion to Suppress

Dear Judge Furman:

The Defendant, Zhengquan Zhang, respectfully requests an extension of the February 24, 2018 deadline to reply to the Government's Memorandum of Law in Opposition to Defendant's Motion to Suppress, Doc #62 ("Opposition"), set by the Court by Order entered February 13, 2018. This is Mr. Zhang's first request for an extension of the reply deadline. The Government has consented to this request. The next hearing is the pretrial conference scheduled for March 20, 2018.

Because the Government's Opposition is lengthy, virtually the same number of pages as Mr. Zheng's Memorandum of Law in Support of Motion to Suppress Evidence, Doc #47, and because the President's Day holiday affords the Defense only four business days from the date of the filing of the Opposition to the reply deadline, there is insufficient time to prepare an adequate reply.

Accordingly, Mr. Zhang requests an extension of the present deadline to reply to the Opposition to March 5, 2018.

Sincerely,
s/Amber Donner
Amber Donner

cc: Via ECF
Eun Young Choi
Won S. Shin
Assistant United States Attorneys